REMARKS

Claims 1-13 were pending in this application.

Applicants have amended Claim 1 to further define the invention.

Applicants have added new Claim 14.

Applicants have cancelled Claims 3-5.

Accordingly, upon entry hereof, Claims 1-2 and 6-14 will be pending.

Applicants turn now to substance of the Action.

Claim Objections

Claims 4 and 5 stand objected to for the reasons given at page 2 of the Action.

Applicants' cancellation of these claims obviates these objections.

Section 102 Rejections

Claims 1-3, 6-8, 10 and 11 stand rejected under 35 U.S.C. § 102(b), as allegedly being anticipated by U.S. Patent No. 5,730,764 ("Williamson et al."), for the reasons given at pages 2-3 of the Action.

Claims 1, 3, 6, 8 and 11-13 stand rejected under 35 U.S.C. § 102(b), as allegedly being anticipated by U.S. Patent No. 4,836,832 ("Tumey et al."), for the reasons given at pages 4-5 of the Action.

Applicants traverse these Section 102 rejections.

As a review for the Examiner, Applicants set forth a summary of the substance of the invention.

The present invention as defined for instance by Claim 1, as amended, is directed to a cationically epoxy resin composition comprising:

(a) an epoxy resin component comprising the combination of bisphenol A epoxy resin, hydrogenated bisphenol A epoxy resin and dicyclopentadiene epoxy resin;

(b) a cationic photo-initiator;

(c) a cationic thermal-initiator and

(d) a filler selected from the group consisting of oxides, hydroxides and carbonates containing a Group II element in the long periodic table.

And the present invention as defined for instance by Claim 14 is directed to a semiconductor device package comprising at least two substrates, at least one of which being constructed from glass, sealed by the product of UV radiation exposure on that composition.

Two patent documents are cited as Section 102 references against Claim 1 (and certain of the claim dependent thereof) and are each discussed in turn below.

Williamson et al. is directed to and claims a coated abrasive product which comprises a backing with abrasive granules supported thereby and adhered thereto, a make coat to a resinous binder and a size coat of a resinous binder. Optionally, the coated abrasive product has a saturant coat, a presize coat or a backsize coat. Williamson et al. states that the improvement lies in the fact that at least one coat of the coated abrasive product is an ionizing irradiation curable epoxy resin formulation having a cationic onium salt initiator in an amount of 0.1 to 10% by weight of the total formulation.

Tumey et al. is directed to and claims a method of preparing a coated abrasive product having a backing, a make coat, a layer of abrasive grains, and a size coat. The make coat and/or size coat are formed from a composition curable by electromagnetic radiation comprising ethylenically-unsaturated groups and 1,2-epoxide groups, and a photoinitiator portion. The photoinitiator portion includes a polymerization photoinitiator selected from (I) salts having an onium cation and a halogen-containing anion of a metal or metalloid, and (II) a mixture of (A) at least one salt having an organometallic

complex cation and a halogen-containing complex anion of a metal or metalloid, and (B) at least one free-radical polymerization initiator. Tumey et al.'s method includes the steps of (1) providing a backing, (2) applying a make coat over the backing, (3) applying a layer of abrasive grains over the make coat, (4) applying a size coat over the layer of abrasive grains, (5) curing the make coat and/or the size coat by exposure to electromagnetic radiation.

It is well settled that in order to be an effective anticipatory reference, a single document must disclose each and every recitation of a claim under review. Failing such precise disclosure, rejections under Section 102 are improper.

Net Moneyin informs of the requirements of Section 102 anticipation.

> [u]nless a reference discloses within the four corners of the document not only all of the limitations claimed but also all of the limitations arranged or combined in the same way as recited in the claim, it cannot be said to prove prior invention of the thing claimed and, thus, cannot anticipate under 35 U.S.C. § 102. Net Moneyin, Inc. v. Verisign, Inc., 545 F.3d 1359, 1371 (Fed. Cir. 2008).

Here, neither Williamson et al. nor Tumey et al. possess such disclosure.

For instance, neither document discloses the combination recited in Claim 1 as amended for the epoxy component (i.e., the combination of bisphenol A epoxy resin, hydrogenated bisphenol A epoxy resin and dicyclopentadiene epoxy resin), and neither speaks to better cure speed or improved humidity reliability, two salient physical properties demonstrated by the invention set forth in the subject application.

Accordingly, as Williamson et al. and Tumey et al. fails to provide the requisite level of disclosure to support a proper Section 102 rejection, reconsideration and withdrawal of the Section 102 rejections are respectfully requested.

Section 103 Rejections

Claim 9 stands rejected under 35 U.S.C. § 103(a) as allegedly being obvious over Williamson et al. in view of Tumey et al. or a computer-generated English-language translation of Japanese Patent Publication No. JP 05-171084 ("Takahashi et al."), for the reasons given at pages 5-6 of the Action.

Claims 12 and 13 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Williamson et al. in view of Tumey et al., for the reasons given at page 7 of the Action.

Applicants traverse the Section 103(a) rejections.

Each of Claims 9, 12 and 13 depend directly or indirectly from independent Claim 1, which is summarized above.

Claim 9 adds to that summary the anion B in the cationic thermal-initiator being selected from SbF_6; PF_6; AsF_6; BF_4; and/or $B(aryl)_4$.

Claim 12 adds to that summary the Group II element in the (C) filler being magnesium.

Claim 13 adds to that summary the (C) filler being selected from MgO, $Mg(OH)_2$, talc, cordierite, magnesium meta-silicate and/or magnesium ortho-silicate.

Applicants also submit that none of Williamson et al., Tumey et al. or Takahashi et al., individually or in combination, discloses, teaches or suggests the invention as so defined, and none provide any motivation to reach the so-defined invention.

As so defined, the present invention with reference to Claim 1 as amended provides faster cure speed and improved humidity reliability.

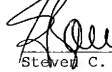
It is only through hindsight reconstruction that the Section 103 rejections against these claims could have been advanced. Hindsight can find no place in the examination of applications for Letters Patent of the United States.

Based on the above, reconsideration and withdrawal of the Section 103 rejections are respectfully requested.

Having addressed and overcome each of the rejections advanced in the Action, prompt and favorable re-consideration of the subject application is respectfully requested.

Applicants' undersigned attorney may be reached by telephone at (860) 571-5001, by facsimile at (860) 571-5028 or by email at steve.bauman@us.henkel.com. All correspondence should be directed to the address given below.

Respectfully submitted,



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